Melissa E. Newman

Vice President – Federal Regulatory DOCKET FILE CO Qwest Communications International Inc

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EX PARTE OR

REDACTED - FOR PUBLIC INSPECTION

VIA COURIER

EX PARTE

FILED/ACCEPT Federal Communications Commission

May 2, 2008

Ms. Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554

> In the Matter of Petition of Owest Corporation for Forbearance Pursuant to 47 Re:

U.S.C. § 160(c) in the Denver Metropolitan Statistical Area, WC Docket No. 07-

Dear Ms. Dortch:

Owest Corporation hereby submits the attached ex parte and request for confidential treatment (pursuant to the Second Protective Order) of certain highly confidential information included in the ex parte, in the above-captioned proceeding.

One copy of the non-redacted version is being submitted; and two copies of the redacted version are being submitted. For both the redacted and non-redacted versions, an extra copy is provided to be stamped and returned to the courier. Both the redacted and non-redacted versions of the ex parte are being served on Staff of the Commission's Wireline Competition Bureau as indicated below. This cover letter does not contain any confidential information.

If you have any questions concerning this submission, please contact me using the information above.

Sincerely,

/s/ Melissa E. Newman

Attachments

Ms. Marlene H. Dortch May 2, 2008

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cc: (via e-mail)

Denise Coca (<u>denise.coca@fcc.gov</u>)

Jeremy Miller (<u>Jeremy.miller@fcc.gov</u>)

Tim Stelzig (<u>tim.stelzig@fcc.gov</u>)

Gary Remondino (two hard copies of the non-redacted version & via <u>gary.remondino@fcc.gov</u>)

REDACTED - FOR PUBLIC INSPECTION



Qwest
1801 California Street, 10th Floor
Denver, Colorado 80202
Phone 303-383-6653
Facsimile 303-896-1107

Daphne E. Butler Corporate Counsel

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VIA COURIER

EXPARTE

May 2, 2008

Ms. Marlene H. Dortch, Secretary Federal Communications Commission 445 12th Street, S.W. Washington, DC 20554

Re:

In the Matter of Petition of Qwest Corporation for Forbearance Pursuant to 47 U.S.C. § 160(c) in the Denver Metropolitan Statistical Area, WC Docket No. 07-

Dear Ms. Dortch:

Qwest Corporation ("Qwest") hereby requests highly confidential treatment of certain information included in the associated *ex parte*. The highly confidential information includes: boundaries of Qwest's Denver Metropolitan Statistical Area ("MSA") retail access line counts by wire center and line type, business retail access service lines by wire center and capacity; the number of retail private line facilities in service by wire center and capacity; and the volumes of unbundled network elements and special access services by capacity or line type provided by Qwest to individual competitive local exchange carriers at the MSA level.

The highly confidential information is submitted pursuant to the June 1, 2007 Second Protective Order (22 FCC Rcd 10134, DA 07-2293) in WC Docket No. 07-97. As required by the Second Protective Order, the highly confidential information (that is, the non-redacted version) is marked HIGHLY CONFIDENTIAL — SUBJECT TO SECOND PROTECTIVE ORDER IN WC DOCKET NO. 07-97 BEFORE THE FEDERAL COMMUNICATIONS COMMISSION. Pursuant to the Second Protective Order, Qwest requests that the non-redacted version of this *ex parte* (containing highly confidential information) be withheld from public inspection.

Qwest considers this highly confidential information as being extremely competitively-sensitive in nature. This type of information is "not routinely available for public inspection" pursuant to both Federal Communications Commission ("Commission") rules 47 C.F.R. §§ 0.457(d) and

Ms. Marlene H. Dortch May, 2, 2008

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0.459 (as Qwest explained and for which it provided legal justification in its Request for Confidential Treatment and Confidentiality Justification submitted with its four Petitions for Forbearance (including the one for the Denver, Colorado MSA) on April 27, 2007.

Qwest is simultaneously submitting, under separate covers, a non-redacted and a redacted version of the associated *ex parte*. The redacted version of the *ex parte* is marked "**REDACTED - FOR PUBLIC INSPECTION**". Both the redacted and non-redacted versions of the *ex parte* are the same except that in the non-confidential version the highly confidential information has been omitted. This cover letter does not contain any confidential information.

If you have any questions concerning this submission, please call me on 303-383-6653.

Sincerely,

/s/ Daphne E. Butler

Attachment

Denver MSA Attachment 6

Request 6: Qwest access line counts. By wire center and line type, provide a breakdown of Qwest MSA-level retail line counts filed by Qwest in support of its petition. For business lines and private line facilities, provide a further breakdown by capacity (DS0, DS1, DS3, OCN).

Response: Qwest is providing, by wire center and line type, its retail access line counts for the Denver MSA as of December 2007. The business retail access lines have been further broken down by capacity. These are the detailed data underlying the MSA-level retail access line counts for December 2007 reported by Qwest in its *ex parte* filing of March 10, 2008.

Qwest is also providing, by wire center and capacity, the number of retail private line facilities in service in the Denver MSA as of December 2007. Qwest's retail private line data has not previously been filed in this docket, either in its original petition or in the above-referenced *ex* parte filing.

Qwest Retail Access Lines in Service as of December 2007 Denver MSA

BEGIN HIGHLY CONFIDENTIAL

Wire Center	CLLI Code	Residence Lines	Business Lines Provided via DS0	Business Lines Provided via DS1	Total Business Lines	Public Lines	Total Qwest Retail Access Lines
		A	В	С	$\mathbf{D} = \mathbf{B} + \mathbf{C}$	E	A+D+E
	1					ı	,
ARVADA	ARVDCOMA						
AURORA	AURRCOMA						
AURORA MONAGHAN	AURRCOMB						
BAILEY	BALYCOMA						
BRIGHTON	BITNCOMA						
BROOMFIELD	BRFDCOMA						
CASTLE ROCK	CSRKCONM						
CENTRAL CITY	CNCYCOMA						
DECKERS	DCKRCOMA						
DENVER CAPITOL HILL	DNVRCOCH						
DENVER COLUMBINE	DNVRCOCL						
DENVER CURTIS PARK	DNVRCOCP						
DENVER DRY CREEK	DNVRCODC						
DENVER EAST	DNVRCOEA						
DENVER MAIN	DNVRCOMA						
DENVER MONTBELLO	DNVRCOMB						
DENVER NORTH	DNVRCONO						
DENVER NORTHEAST	DNVRCONE						
DENVER SMOKY HILL	DNVRCOSH						
DENVER SOUTH	DNVRCOSO						
DENVER SOUTHEAST	DNVRCOSE						
DENVER SOUTHWEST	DNVRCOSW	- 1					
DENVER SULLIVAN	DNVRCOSL						
DENVER WEST	DNVRCOWS						

DNVR INTL AIRPORT	DNVRCOOU	-				
ELBERT	ELBRCOMA					
ELIZABETH	ELZBCO01					
ENGLEWOOD	ENWDCOMA				 	 ·
ENGLEWOOD ABERDEEN	ENWDCOAB					
EVERGREEN	EVRGCOMA				 	
GEORGETOWN	GRTWCOMA	<u></u>	<u> </u>		 	
GÖLDEN	GLDNCOMA	 				
IDAHO SPRINGS	IDSPCOMA				 	
KIOWA	KIOWCONM				 	
LAKEWOOD	LKWDCOMA				 	
LARKSPUR	LRKSCONM				 	
LITTLETON	LTTNCOMA	- · · · · · · · · · · · · · · · · · · ·				
LITTLETON HIGHLANDS RANCH	LTTNCOHL					
LOOKOUT MOUNTAIN	LKMTCOMA					
MORRISON	MRSNCOMA			,		
NORTHGLENN	NGLNCOMA					
PARKER	PRKRCOMA					
WESTMINISTER	WMNSCOMA				 	
Denver MSA Totals						

Qwest Retail Private Line Facilities in Service as of December 2007 Denver MSA

Wire Center	CLLI Code	Analog Private Line	DS0	DS1	DS3	OC-3	OC-12	OC-24	OC-48	OC-192	Total Retail Private Line Facilities
ARVADA	ARVDCOMA										
AURORA	AURRCOMA										
AURORA MONAGHAN	AURRCOMB					-					
BAILEY	BALYCOMA										
BRIGHTON	BITNCOMA										
BROOMFIELD	BRFDCOMA										
CASTLE ROCK	CSRKCONM										
CENTRAL CITY	CNCYCOMA								-		
DECKERS	DCKRCOMA										
DENVER CAPITOL HILL	DNVRCOCH		:		<u></u>						
DENVER COLUMBINE	DNVRCOCL										
DENVER CURTIS PARK	DNVRCOCP										
DENVER DRY CREEK	DNVRCODC		,								
DENVER EAST	DNVRCOEA										
DENVER INTL AIRPORT	DNVRCOOU		}		1						
DENVER MAIN	DNVRCOMA										
DENVER MONTBELLO	DNVRCOMB										
DENVER NORTH	DNVRCONO										
DENVER NORTHEAST	DNVRCONE										
DENVER SMOKY HILL	DNVRCOSH										
DENVER SOUTH	DNVRCOSO										
DENVER SOUTHEAST	DNVRCOSE				_						
DENVER SOUTHWEST	DNVRCOSW										
DENVER SULLIVAN	DNVRCOSL										
DENVER WEST	DNVRCOWS										

ELBERT	ELBRCOMA		Ι.					
ELIZABETH	ELZBCO01					-		
ENGLEWOOD	ENWDCOMA							
ENGLEWOOD ABERDEEN	ENWDCOAB			. <u> </u>	 			
EVERGREEN	EVRGCOMA	_						
GEORGETOWN	GRTWCOMA							
GOLDEN	GLDNCOMA				 			
IDAHÓ SPRINGS	IDSPCOMA							
KIOWA	KIOWCONM							
LAKEWOOD	LKWDCOMA				 			
LARKSPUR	LRKSCONM							
LITTLETON	LTTNCOMA							
LITTLETON HIGHLANDS								
RANCH	LTTNCOHL	_						
LOOKOUT MOUNTAIN	LKMTCOMA				•			
MORRISON	MRSNCOMA							
NORTHGLENN	NGLNCOMA							
PARKER	PRKRCOMA							
WESTMINISTER	WMNSCOMA							
Denver MSA Totals								

^{***}END HIGHLY CONFIDENTIAL***

Denver MSA Attachment 7

Request 7: Provide an accounting, by CLEC name, of the UNEs and/or special access services being provided by Qwest to the CLECs in each wire center of each of the four MSAs. Provide the capacity of the services (*i.e.*, DS0, DS1, DS3, OCN).

Response: The data sought by this request cannot be fully provided on a CLEC-by-CLEC basis without a written subpoena. However, as agreed upon, the data is being provided at an MSA level, with CLEC names masked to protect specific CLEC identity. As a further means of maintaining CLEC confidentiality, line counts less than 10, as indicated by the presence of an asterisk, have been withheld.

The data being provided is as of December 2007, which is the same vintage as the data shown in the updated Highly Confidential Exhibit 2 provided by Qwest in its *ex parte* filing of March 10, 2008.

Unbundled Network Elements ("UNE") in Service as of December 31, 2007¹ Denver MSA

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CLEC IDENTIFIER	UNE LOOP 2 WIRE	UNE LOOP DIG-2W	UNE LOOP DIG-ADSL	UNE LOOP DIG-4W	UNE LOOP DIG-DS1	UNE LOOP DIG-DS3	UNE LOOP DIG-BRI	UNE LOOP DIG-XDSL
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END HIGHLY CONFIDENTIAL

¹ NOTES:

[•] Entries marked with an asterisk denote a quantity of less than 10. Specific counts are being withheld to maintain confidentiality.

[•] Each CLEC Identifier represents the consolidated operations of that particular CLEC.

[•] DS1 and DS3 quantities shown are counts of the actual facilities in service, and not the voice grade equivalents that may potentially be provided over those facilities.

Enhanced Extended Loops ("EELs") in Service as of December 31, 2007²
Denver MSA

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CLEC IDENTIFIER	DS1

END HIGHLY CONFIDENTIAL

² NOTES:

[•] Entries marked with an asterisk denote a quantity of less than 10. Specific counts are being withheld to maintain confidentiality.

[•] Each CLEC Identifier represents the consolidated operations of that particular CLEC.

[•] DS1 quantities shown are counts of the actual facilities in service, and not the voice grade equivalents that may potentially be provided over those facilities.

Platform Services as of December 31, 2007³ Qwest Platform Plus ("QPP"); Qwest Local Services Platform ("QSLP") Denver MSA

BEGIN HIGHLY CONFIDENTIAL

CLEC IDENTIFIER	QPP RES	QPP BUS	QPP CENTREX	QPP ISDN BRI	QPP PBX	QLSP RES	QLSP BUS	QLSP CENTREX	QLSP PAL	QLSP PBX TRUNKS	QLSP ISDN BASIC
							•				
]								
		-									
					·						
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³ NOTES:

- Entries marked with an asterisk denote a quantity of less than 10. Specific counts are being withheld to maintain confidentiality.
- Each CLEC Identifier represents the consolidated operations of that particular CLEC.
- Because only one CLEC was purchasing UNE-P service as of December 2007, those quantities have been combined with the corresponding QPP or QLSP products to maintain confidentiality.

END HIGHLY CONFIDENTIAL

Wholesale Resale in Service as of December 31, 2007⁴

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CLEC IDENTIFIER	DUCIMECO	DECIDENCE	DUDITO
DENTIFIER	BUSINESS	RESIDENCE	PUBLIC
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- Entries marked with an asterisk denote a quantity of less than 10. Specific counts are being withheld to maintain confidentiality.
- Each CLEC Identifier represents the consolidated operations of that particular CLEC.

⁴ NOTES:

Special Access in Service as of December 31, 2007⁵ Denver MSA

BEGIN HIGHLY CONFIDENTIAL

CLEC IDENTIFIER	ANALOG PRIVATE LINE	DS0	DS1	DS3	OCN
					<u> </u>
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	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	.,,			
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END HIGHLY CONFIDENTIAL

⁵ NOTES:

- Entries marked with an asterisk denote a quantity of less than 10. Specific counts are being withheld to maintain confidentiality.
- Each CLEC Identifier represents the consolidated operations of that particular CLEC.